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Attorneys for Defendants Gen Digital Inc. and Jumpshot Inc.				
15	Additional Counsel on Signature Page			
16	UNITED STATES DISTRICT COURT			
17	NORTHERN DISTR	ICT OF CALIFORNIA		
18	SAN FRANCI	SCO DIVISION		
19				
20	GRACE LAU and CHRISTOPHER KARWOWSKI, individually and on behalf of	No. 3:22-cv-08981- <del>LJC</del> JST		
21	all others similarly situated,	STIPULATION AND <del>[PROPOSED]</del> ORDER SETTING BRIEFING SCHEDULE		
22	Plaintiffs,			
23	V.			
24	GEN DIGITAL INC. a corporation, and JUMPSHOT INC., a corporation,			
25	Defendants			
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STIP. AND [PROPOSED] ORDER SETTING BRIEFING SCHEDULE CASE NO. 3:22-cv-08981-<del>LJC</del> JST

1	Pursuant to Local Rules 6-2 and 7-12, Plaintiffs Grace Lau and Christopher Karwoski		
2	("Plaintiffs") and Defendants Gen Digital Inc. and Jumpshot Inc. (collectively "Defendants," and		
3	together with Plaintiff, the "Parties"), by and through their undersigned counsel, hereby stipulate		
4	and agree as follows and jointly request that the Court enter the below Order approving this		
5	stipulation.		
6	WHEREAS, on December 19, 2022, Plaintiffs filed their Class Action Complaint (Dkt.		
7	1);		
8	WHEREAS, the Plaintiffs served the summons and complaint on Defendants on		
9	December 23, 2022;		
10	WHEREAS, Defendants' deadline to answer or otherwise respond to the Class Action		
11	Complaint is currently January 13, 2023;		
12	WHEREAS, undersigned counsel for Defendants has only recently been engaged to		
13	represent Defendants in this matter;		
14	WHEREAS, Defendants anticipate moving to dismiss the Class Action Complaint;		
15	WHEREAS, counsel for the Parties have met and conferred regarding a briefing		
16	schedule for Defendants forthcoming motion to dismiss, taking into account the complexity of		
17	the case;		
18	WHEREAS, the parties agree that extending the deadline for Defendants to answer or		
19	otherwise respond to the complaint and setting the briefing schedule set forth below will provide		
20	the parties sufficient time to brief the issues in dispute;		
21	WHEREAS, this extension of time will not alter the date of any other event or deadline		
22	already fixed by Court order;		
23	NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,		
24	subject to Court approval, that the briefing schedule will be modified as follows:		
25	1. Defendants shall file their Motion to Dismiss on or before February 24, 2023.		
26	2. Plaintiffs shall file their opposition to Defendants' Motion to Dismiss on or before		
27	April 17, 2023.		
28			

1	3.	Defendants shall file their Reply in Support of their Motion to Dismiss by May
2	17, 2023.	
3	4.	In the event the Court has not reviewed or ruled on this stipulation on or before
4	the responsive pleading deadline of January 13, 2023, Plaintiffs will not seek default or move for	
5	default judgment on the basis that Defendants' responsive motion or pleading was not filed by	
6	that date.	
7	Dated: Janu	ary 11, 2023 Respectfully submitted,
8		
9		LATHAM & WATKINS LLP
10		By /s/ Michael H. Rubin
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23		Attorneys for Defendants Gen Digital Inc. and Jumpshot Inc.
24		
25	Dated: Janu	ary 11, 2023 By <u>/s/ Jonathan Rotter</u> Jonathan M. Rotter (State Bar No. 234137)
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19	Attorneys for Plaintiffs	
20		
21	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
22	Dated: January 13, 2023  Honorable Lisa J. Cisneles Jon S. Tigar	
23	UNITED STATES <del>MAGISTRATE</del> JUDGE	
24	DISTRICT	
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